

# **EXHIBIT**

## **D**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA COLLEGE  
OF MEDICINE, a foreign corporation,

Plaintiff,

United States District Court Judge  
Patrick J. Duggan, presiding  
Michael Hluchaniuk, referral  
Case No.: 2:10-cv-10978

V

STEVEN L. WOODWARD,

Defendant.

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Eric A. Buikema (P58379) CARDELLI, LANFEAR & BUIKEMA, P.C. Attorneys for Plaintiff 322 W. Lincoln Royal Oak, MI 48067 (248) 544-1100 ebuikema@cardellilaw.com	STEVEN L. WOODWARD In Pro Per c/o 7211 Brittwood Lane Flint, MI 48507 Steve_L_woodward@yahoo.com
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**PLAINTIFF'S REQUESTS FOR ADMISSIONS**

Plaintiff American University of Antigua College of Medicine, through counsel, pursuant to Fed. R. Civ. P. 36 submits the following requests for admission. Your answer must admit the request, specifically deny the request, or make a statement that you cannot truthfully admit or deny the request. Fed. R. Civ. P. 36(a)(4). A denial must fairly respond to the substance of the matter. Fed. R. Civ. P. 36(a)(4). Pursuant to Fed. R. Civ. P. 36(a)(3) you have 30 days from the date of this request to respond.

**REQUEST 1**

Please admit that you are the owner and operator of aua-med.com

**RESPONSE:**

**REQUEST 2**

Please admit that you are the YouTube user auastudentrights.

**RESPONSE:**

**REQUEST 3**

Please admit that you are the owner of the YouTube channel auastudentrights.

**RESPONSE:**

**REQUEST 4**

Please admit that a purpose of aua-med.com is to deter potential students from enrolling at AUA.

**RESPONSE:**

**REQUEST 5**

Please admit that a purpose of the auastudentrights videos on YouTube is to deter potential students from enrolling at AUA.

**RESPONSE:**

**REQUEST 6**

Please admit that a purpose of the auastudentrights Channel on YouTube is to deter potential students from enrolling at AUA.

**RESPONSE:**

**REQUEST 7**

Please admit that on or before July 23, 2010 you republished aua-med.com without permission from the court.

**RESPONSE:**

**REQUEST 8**

Please admit that on or before July 23, 2010 you republished the videos by auastudentrights on YouTube and the associated channel without permission from the court.

**RESPONSE:**

**REQUEST 9**

Please admit that people have viewed the aua-med.com website and sent you that these viewers are not parties to the instant suit.

**RESPONSE:**

**REQUEST 10**

Please admit that people have viewed and commented on the auastudent rights videos and associated channel on YouTube and that these viewers are not parties to the instant suit.

**RESPONSE:**

**REQUEST 11**

Please admit that you published the following file: <http://www.aua-med.com/downloads/usmle-pass-rate.ppt>

**RESPONSE:**

**REQUEST 12**

Please admit that the <http://www.aua-med.com/downloads/usmle-pass-rate.ppt> document contains embedded student information including GPA and USMLE scores.

**RESPONSE:**

**REQUEST 13**

Please admit that the statements made on your website are intended to be factual.

**RESPONSE:**

**REQUEST 14**

Please admit that you published statements that AUA routinely commits fraud upon its students;

**RESPONSE:**

**REQUEST 15**

Please admit that you published statements that AUA falsifies its students' grades;

**RESPONSE:**

**REQUEST 16**

Please admit that you published statements that AUA breaches contracts

**RESPONSE:**

**REQUEST 17**

Please admit that you published statements that AUA disregards student civil rights;

**RESPONSE:**

**REQUEST 18**

Please admit that you published statements that AUA conspires against its students;

**RESPONSE:**

**REQUEST 19**

Please admit that you published statements that AUA engages in unethical practices;

**RESPONSE:**

**REQUEST 20**

Please admit that you published statements that AUA has “malicious intensions”

**RESPONSE:**

**REQUEST 21**

Please admit that you published statements that AUA administration and academic advisors are of a "heinous nature";

**RESPONSE:**

**REQUEST 22**

Please admit that you published statements that AUA students are sexually assaulted;

**RESPONSE:**

**REQUEST 23**

Please admit that you published statements that AUA professors teach students wrong information

**RESPONSE:**

**REQUEST 24**

Please admit that you published statements that AUA conspires to commit fraud and violations of civil rights;

**RESPONSE:**

**REQUEST 25**

Please admit that you published statements that AUA commits criminal activities reportable to the FBI.

**RESPONSE:**

**REQUEST 26**

Please admit that the only basis for your statement that AUA's alleged criminal activities are reportable to the FBI is your own report of these alleged activities to the FBI.

**RESPONSE:**

**REQUEST 27**

Please admit that you have no knowledge or information about other reports made about AUA to the FBI.

**RESPONSE:**

**REQUEST 28**

Please admit that you published statements that AUA's student pass rate for USMLE medical board exams is only 22.9%;

**RESPONSE:**

**REQUEST 29**

Please admit that you published statements that AUA contrives false evidence in student disciplinary proceedings;

**RESPONSE:**



**REQUEST 30**

Please admit that you published statements that AUA colluded with St. Joseph Hospital to maliciously end your career.

**RESPONSE:**

**REQUEST 31**

Please admit that you published statements that AUA's agents and employees engaged in a conspiracy.

**RESPONSE:**

**REQUEST 32**

Please admit that you published statements that AUA abused its power.

**RESPONSE:**

**REQUEST 33**

Please admit that you published statements that AUA committed perjury.

**RESPONSE:**

**REQUEST 34**

Please admit that you published statements that AUA is otherwise immoral and unethical.

**RESPONSE:**

**REQUEST 35**

Please admit that you published statements that AUA's agents are liars;

**RESPONSE:**

**REQUEST 36**

Please admit that you published statements that Antigua is full of "rape, murder, fraud, and government corruption" and that therefore AUA is an unsafe place.

**RESPONSE:**

**REQUEST 37**

If you admitted that you published any of the statements outlined in Requests 14 through 25 and 28 through 36, for each, please admit that you knew the statements were false when published.

**REQUEST 38**

If you admitted that you published any of the statements outlined in Requests 14 through 25 and 28 through 36, for each, please admit that you had no knowledge regarding the truth or falsity of the statement when you published it.

**RESPONSE:**

**REQUEST 39**

Please admit that you do not have and never had any license, approval or other form of consent from AUA to reproduce or otherwise utilize AUA's tradename, trademarks or logos on your websites.

**RESPONSE:**

/s/ Eric A. Buikema (P58379)  
Eric A. Buikema (P58379)  
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Dated: November 8, 2010